

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

FREDRIC A. GUENTHER, an individual; WALTON FUJIMOTO, an individual, and LESLIE OWEN, an individual,

Plaintiffs

v.

BP RETIREMENT ACCUMULATION PLAN, by its Plan Administrator, the Senior Vice President of Human Resources of BP CORPORATION NORTH AMERICA INC.; and BP CORPORATION NORTH AMERICA INC., a corporation,

Defendants.

Civil Action No. 4:16-CV-995

**PLAINTIFFS' SECOND AMENDED EXHIBIT LIST**

<b>PLAINTIFFS' TRIAL EX. #</b>	<b>DESCRIPTION</b>	<b>DATE ADMITTED</b>
3	Meeting Notes in Houston Prior to General Rollout of RAP  (Dep. Ex. 3; GUE002664 - GUE002666)	6/27/23
6	James Ross Letter dated 06.12.89 re. Retirement Accumulation Plan w Brochure  (Dep. Ex. 6; GUE 001299 - GUE 001325)	Pre-admitted
8	Letter from BP (C.M. Laird) dated 07.19.89 re. Alaska North Slope Employees Plan  (Dep. Ex. 8; GUE 002540 - GUE 002565)	Pre-admitted
9	July 21, 2011 Letter from Rick Dorazil to "Heritage Sohio Employee"  (GUE 000093 - GUE 000094)	Pre-admitted

<b>PLAINTIFFS' TRIAL EX. #</b>	<b>DESCRIPTION</b>	<b>DATE ADMITTED</b>
22	J. Grdina Curriculum Vitae  (Dep. Ex. 22)	6/27/23
36	Email Chain; Fritz to John Minge and Steve Bennion. Cliff York to Fritz. Dudley to Schuster re. Heritage Sohio dated 02.07.13  (Dep. Ex. 36; BP 0019843 - BP 0019847)	Pre-admitted
37	BP America RAP Major Features (Slide Deck)  (Dep. Ex. 37; BP_0017646 - BP_0017667; GUE 000708 - GUE 000729)	Pre-admitted
38	Nelson Letter dated 06.12.89 re. Retirement Accumulation Plan  (Dep. Ex. 38; GUE 000238)	Pre-admitted
39	Undated letter to Guenther re. BP proposed accounting for RAP Opening Balance  (Dep. Ex. 39; GUE 001814 - GUE 001817)	Pre-admitted
41	04.19.18 re. Pension Modeling Statement for Guenther  (Dep. Ex. 41; GUE 002705 - GUE 002720)	Pre-admitted
43	Letter from BP to Guenther dated 11.29.12 re. Benefit Calculations  (Dep. Ex. 43; BP 0019923 - BP 0019924)	Pre-admitted
44	02.27.15 Letter from MHL to BP ERISA Claims Analyst  (Dep. Ex. 44; GUE 000001 - GUE 000008)	Pre-admitted
45	10.15.15 Letter from MHL to RAP Appeal Admin re. Guenther Claim  (Dep. Ex. 45; GUE 002343 - GUE 002359)	Pre-admitted
46	Letter from BP to Lee James dated 12.30.15 re. Guenther Appeal  (Dep. Ex. 46; GUE 002391 - GUE 002407)	Pre-admitted

<b>PLAINTIFFS' TRIAL EX. #</b>	<b>DESCRIPTION</b>	<b>DATE ADMITTED</b>
51	EPTG Pension Discuss Slides  (Dep. Ex. 51)	6/27/23
59	Email between Weiss and Guenther re. pension issue update  (Dep. Ex. 59; BP 0020181 - BP 0020182)	Pre-admitted
60	Email to Weiss from Guenther re. 89-page letter from J Ross  (Dep. Ex. 60; BP 0020210 - BP 0020211)	Pre-admitted
69	12.15.14 Email from Hall to James re. settlement  (Dep. Ex. 69; GUE 002658 - GUE 002659)	6/20/23
70	Fujimoto Settlement Agreement & Release  (Dep. Ex. 70; BP 0024090 - BP 0024094)	Pre-admitted
71	01.20.15 Letter from Helena Hall to Fujimoto  (Dep. Ex. 71; BP 0024087 - BP 0024089)	Pre-admitted
77	Letter to Fujimoto with Opening Account Information  (Dep. Ex. 77; BP 0019941 - BP 0019945)	Pre-admitted
85	Fujimoto Pension Benefit Election Authorization  (Dep. Ex. 85; BP 0019932 - BP 0019940)	Pre-admitted
86	Mandatory Cashout Check #xxx1965 and #xxx3553 to S Fujimoto  (Dep. Ex. 86; GUE 002667 - GUE 002669)	Pre-admitted
92	10/15/11 to 10/16/11 Email Correspondence between Billie Garde and Jeff Heller  (Dep. Ex. 92; OoO 4919 - OoO 4921; Dkt. 141-04 (Ex D.))	7/14/23
93	Letter from Heller to Judge Sporkin dated 10.24.11  (Dep. Ex. 93; OoO 4922 - OoO 4924)	7/14/23

<b>PLAINTIFFS' TRIAL EX. #</b>	<b>DESCRIPTION</b>	<b>DATE ADMITTED</b>
95	Email of 10.27.12 from M Brothers to York re. side-by-side comparison  (Dep. Ex. 95; OoO 4265 - OoO 4267)	7/13/23
96	11.14.12 Email from Heller to York re. no response  (Dep. Ex. 96; OoO 4910 - OoO 4911)	7/14/23
97	Email from B Garde to personal email re. conversation with Heller  (Dep. Ex. 97; OoO 4906 – OoO 4907)	7/14/23
98	12.14.12 Email from Heller to S Cornwell re. Draft Communication to SOHIO Concerned Employees  (Dep. Ex. 98; OoO 4901 - OoO 4905)	7/14/23
99	Comments from Heller dated 12.18.12 re. pension disparity  (Dep. Ex. 99; OoO 4263)	7/13/23
100	12.18.12 Email from J Heller to B Garde re. Sohio Pension Issue  (Dep. Ex. 100; OoO 4258 - OoO 4262)	7/11/23 and 7/14/23
101	12.18.12 Email from P Eatedali to Employees re. pension disparity  (Dep. Ex. 101; OoO 4971 - OoO 4972)	Pre-admitted
103	Email string of 01.24.13 from Garde to Heller re. Sohio  (Dep. Ex. 103; OoO 4890 - OoO 4892)	7/14/23
106	Email Abbassi to Garde dated 01.30.13 re. Minge response  (Dep. Ex. 106; OoO 4684 - OoO 4689)	7/13/23
107	Email Abbassi to "undisclosed" dated 03.28.13 re. Amoco Arco retention  (Dep. Ex. 107; OoO 00086 - OoO 00088)	7/13/23

<b>PLAINTIFFS' TRIAL EX. #</b>	<b>DESCRIPTION</b>	<b>DATE ADMITTED</b>
108	Email Brothers to Garde dated 04.19.13 re. comparison spreadsheets  (Dep. Ex. 108; OoO 4439 - OoO 4443)	7/13/23
109	Email Brothers to Cornwell dated 04.02.13 re. Confidential Draft Communication to Sohio CIs  (Dep. Ex. 109; OoO 4268 - OoO 4271)	7/13/23
110	4.2-10.13 Email Heller and Eatedali re. Draft BP Office of Ombudsman Confid.  (Dep. Ex. 110; OoO 7151 - OoO 7153)	7/14/23
111	04.11.13 Email Garde to Heller re. Draft Comm to Sohio CIs  (Dep. Ex. 111; OoO 7154 - OoO 7157)	7/14/23
112	04.12.13 Email Cornwell to Redacted re. Update from Office of Ombudsman to Sohio Employees  (Dep. Ex. 112; OoO 4969 - OoO 4970)	Pre-admitted
113	04.19.13 Email from Garde to Heller  (Dep. Ex. 113; OoO 5199 - OoO 5202)	7/14/23
116	05.24.13 Email Eatedali to Abbassi re. follow up to pension matter.  (Dep. Ex. 116; OoO 4968)	Pre-admitted and Admitted 7/14/23
117	07.02.13 Email Eatedali to Garde re. RAP Ret. Benefits  (Dep. Ex. 117; OoO 7163 -7168)	7/13/23
118	07.22.13 Email Abbassi to Cornwell re. Update  (Dep. Ex. 118; OoO 02349 - OoO 02350)	Pre-admitted and Admitted 7/14/23
121	Issues Spreadsheet: Enhancements to AR/AM were unfair to Sohio  (Dep. Ex. 121; OoO 4522 - OoO 4536)	7/13/23
122	08.29.13 Email Garde to Heller re. Q&A docs  (Dep. Ex. 122; OoO 7169 - OoO 7181)	7/13/23

<b>PLAINTIFFS' TRIAL EX. #</b>	<b>DESCRIPTION</b>	<b>DATE ADMITTED</b>
123	08.30.13 Email Garde to Heller re. final QA Resend  (Dep. Ex. 123; OoO 7242 - 7244; OoO 7251 - OoO 7252)	7/14/23
125	09.19.13 Email from Abbassi to Redacted re. Fifth Update to CIs  (Dep. Ex. 125; OoO 4965 - OoO 4966)	7/14/23
128	09.26.13 Email Garde to Heller re. Officer of Ombudsman visit  (Dep. Ex. 128; OoO 7272 - OoO 7273)	7/14/23
129	10.23.13 Email Garde to Cornwell re. SOHIO QAs w BP Responses  (Dep. Ex. 129; OoO 7206 - OoO 7224)	7/14/23
130	10.23.13 Email Garde to Heller re. BP Responses to Sohio Heritage Retirement Questions  (Dep. Ex. 130; OoO 7229 - OoO 7230)	7/14/23
132	02.21.14 Email Heller to Cornwell re. Comments on draft Office of Ombudsman Letter  (Dep. Ex. 132; OoO 5225 - OoO 5231)	7/13/23
133	02.21.14 Email Garde to Cornwell re. comments on draft Office of Ombudsman Letter  (Dep. Ex. 133; OoO 7231 - OoO 7237)	7/13/23
134	Undated letter from Garde to Sohio Individuals (6th Update)  (Dep. Ex. 134; OoO 4964)	Pre-admitted
135	03.13.14 Letter from Office of Ombudsman re. 7th Update  (Dep. Ex. 135; OoO 4963)	Pre-admitted
136	05.08.14 Email Guenther to Cornwell re. Message from BP Office of Ombudsman  (Dep. Ex. 136; OoO 5885 - OoO 5886)	Pre-admitted

<b>PLAINTIFFS' TRIAL EX. #</b>	<b>DESCRIPTION</b>	<b>DATE ADMITTED</b>
137	10.24.11 Letter from Heller to Judge Sporkin re. Pension Inquiry  (Dep. Ex. 137; OoO 5216 - OoO 5219)	7/14/23
138	07.30.14 Email Garde to Heller re. Draft Status of Update Statement  (Dep. Ex. 138; OoO 7238)	7/14/23
139	Sporkin Lynch Update of 08.17.14  (Dep. Ex. 139; OoO 4955 - OoO 4960)	7/17/23
141	09.05.14 Email Garde to Heller re. Sohio Draft Communication  (Dep. Ex. 141; OoO 7245 - OoO 7250)	7/14/23
142	09.16.14 Email Garde to Cornwell re. BP Sohio Message  (Dep. Ex. 142; OoO 7253 - OoO 7262)	7/14/23
143	09.19.14 Letter from S. Sporkin to "Concerned Employee"  (Dep. Ex. 143; OoO 7331 - OoO 7332)	7/13/23
144	Office of Ombudsman Investigation Final Report Summary  (Dep. Ex. 144; OoO 7263 - OoO 7271)	7/13/23
145	A Message from J. Minge dated 09.22.14  (Dep. Ex. 145; OoO 2399)	Pre-admitted and Admitted 7/14/23
146	Confidential Investigation Final Report Case No 2011-052  (Dep. Ex. 146; OoO 7349 - OoO 7411)	7/13/23
150	10.6.13 Email Ward to Heller and Weiss to Denman re. Office of Ombudsman investigation incomplete  (Dep. Ex. 150; BP 0026078 - BP 0026080)	7/11/23

<b>PLAINTIFFS' TRIAL EX. #</b>	<b>DESCRIPTION</b>	<b>DATE ADMITTED</b>
156	08.04.14 Email Weiss to Hall re. Draft of Breach of Code of Conduct Filing  (Dep. Ex. 156; BP 0026258 - BP 0026259)	7/11/23
159	04.17.14 Email Weiss to Guenther re. Pension Issue Update  (Dep. Ex. 159)	6/22/23
168	10.25.11 Email from Heller to Judge Sporkin w Attached Letter  (Dep. Ex. 168; BP 0024351 - BP 0024356)	7/18/23
169	09.15.14 Letter to Sohio Employ from Minge  (Dep. Ex. 169; GUE 000096 - GUE 000097)	Pre-admitted
170	Kwasha Lipton Cash Balance Pension Plan – Fall 1987  (Dep. Ex. 170; BP 0028339 - BP 0028369)	Pre-admitted
174	Kwasha Lipton Memo 03.28.88 from Liberty/Salinaro re. Uniform Salaried Pension Plan Study  (Dep. Ex. 174; BP 0027920 - BP 0027923)	Pre-admitted
175	04.12.88 Memo from Liberty/Salinaro re. Uniform Salaried Pension Plan Study  (Dep. Ex. 175; BP 0027918 - BP 0007919)	Pre-admitted
176	04.19.88 Fax from Salinaro to Collier re. Lump Sum Benefit of Full Career Employees  (Dep. Ex. 176; BP 0027913 - BP 0027917)	Pre-admitted
177	05.10.88 Kwasha Lipton Comparison of Benefits  (Dep. Ex. 177; BP 0027545)	Pre-admitted
180	07.21.88 Transmittal re. Proposed Account Balance Plan  (Dep. Ex. 180; BP 0026878 - BP 0026889)	Pre-admitted
181	08.10.88 Transmittal re. Account Balance Plan as a Percentage of the Standard Oil Retirement Plan by age  (Dep. Ex. 181; BP 0027662 - BP 0027665)	Pre-admitted



<b>PLAINTIFFS' TRIAL EX. #</b>	<b>DESCRIPTION</b>	<b>DATE ADMITTED</b>
182	08.19.88 Details of Proposed Account Balance Plan Formula  (Dep. Ex. 182; BP 0027657 - BP 0027661)	Pre-admitted
183	08.26.88 Kwasha Lipton Letter K. Salinaro to E. Rossman re. Account Balance Plan  (Dep. Ex. 183; BP 0027633 - BP 0027648)	Pre-admitted
184	09.01.88 Kwasha Lipton – BP America Lump Sum Value of Benefits at Termination  (Dep. Ex. 184; BP 0027596 - BP 0027602)	Pre-admitted
185	09.01.88 Kwasha Lipton – BP America Lump Sum Value of Benefits at Termination  (Dep. Ex. 185; BP 0027631 - BP 0027632)	Pre-admitted
186	09.02.88 BP America Illustration of Benefits due upon Retirement  (Dep. Ex. 186; BP_0027626 - BP_0027630)	Pre-admitted
187	10.01.88 Kwasha Lipton – Objectives for the Study (first page)  (Dep. Ex. 187; BP 0027603)	Pre-admitted
190	11.17.88 Kwasha Lipton Letter to E. Rossman re. Account Balance Pension Plan  (Dep. Ex. 190; BP 0026847 - BP 0026852)	Pre-admitted
191	11.18.88 Kwasha Lipton Memo to Rossman and others re. Result of 11.10.88 Implementation Mtg  (Dep. Ex. 191; BP 0028017 - BP 0028020)	Pre-admitted
192	11.18.88 Memo from OT Williams re. Account Balance Mtg  (Dep. Ex. 192; BP 0026853 - BP 0026866)	Pre-admitted

<b>PLAINTIFFS' TRIAL EX. #</b>	<b>DESCRIPTION</b>	<b>DATE ADMITTED</b>
193	11.28.88 Kwasha Lipton Letter to E Rossman from E Selip re. Account Balance Plan  (Dep. Ex. 193; BP 0026759 - BP 0026763)	Pre-admitted
194	12.05.88 Kwasha Lipton Letter to E Rossman from E Selip re. Second Draft of Letter and New Brochure  (Dep. Ex. 194; BP_0028466; BP_0028444 - BP 0028446)	Pre-admitted
195	12.05.88 Kwasha Lipton BP America Retirement Accumulation Plan Highlight Brochure – First Draft  (Dep. Ex. 195; BP 0028458 - BP 0028465)	Pre-admitted
196	12.05.88 Kwasha Lipton BP America RAP Highlight Brochure - Long Version  (Dep. Ex. 196; BP 0028447 - BP 0028457)	Pre-admitted
197	Draft of 12.08.88 Employee letter re. Companies Retirement Plan from HR  (Dep. Ex. 197; BP 0027456 - BP 0027457)	Pre-admitted
204	12.09.77 Letter from E. Selip to E Rossman re. third draft  (Dep. Ex. 204; BP 0028478)	Pre-admitted
205	04.21.89 BP RAP Detailed Brochure – Sixth Draft  (Dep. Ex. 205; BP 0028648 - BP 0028692)	Pre-admitted
206	04.25.89 BP RAP Detailed Brochure – Thirteenth Draft  (Dep. Ex. 206; BP 0026452 - BP 0026456)	Pre-admitted
207	05.01.89 BP RAP Draft of Long Brochure  (Dep. Ex. 207; BP 0026366 - BP 0026390)	Pre-admitted
212	Actuarial Information Form – Draft  (Dep. Ex. 212; BP 0026493 - BP 0026494)	6/23/23
213	Kwasha Lipton Retirement Plans for US Employees  (Dep. Ex. 213; BP 0026462)	6/23/23

<b>PLAINTIFFS' TRIAL EX. #</b>	<b>DESCRIPTION</b>	<b>DATE ADMITTED</b>
214	Focus on Benefits pamphlet dated Sept. 1999  (Dep. Ex. 214; BP_0013467 - BP_0013468; BP_0013478)	6/27/23
216	Pension Plan Consolidation Project of Feb. 29, 1988  (Dep. Ex. 216; BP_0026665 - BP_0026669)	Pre-admitted
220	07.13.88 Memo to members of Exec Officer Committee from McAuliffe re. Proposed Pension Plan  (Dep. Ex. 220; BP_0026890 - BP_0026894; BP_0028394 -BP_0028396; BP_0028224)	Pre-admitted
222	09.21.88 Memo to Members of Exec Officer's Committee from McAuliffe re. Areas of Concern with Proposed Account Balance Pension Plan  (Dep. Ex. 222; BP_0028414 - BP_0028416; BP_0028220; BP_0028218; BP_0028299; BP_0028322)	Pre-admitted
223	11.17.88 Memo to AS Herbert from McAuliffe re. revisions to certain BP America pension plans  (Dep. Ex. 223; BP_0030583 - BP_0030584)	Pre-admitted
225	12.26.89 Memo to DR Bankowski from McAuliffe re. Adoption of BP America RAP  (Dep. Ex. 225; BP_0026527 - BP_0026528)	Pre-admitted
227	08.15.88 Memo to EP Browne from McAuliffe re. pension Plan Funding Policy/methodology  (Dep. Ex. 227; BP_0027556 - BP_0027558)	Pre-admitted
229	1988 Retirement Plan Goals  (Dep. Ex. 229; BP_0028373 - BP_0028385)	Pre-admitted
231	Adoption of Account Balance Pension Plan re. revising salaried employees pension plan as of Jan. 1989  (Dep. Ex. 231; BP_0027513 – BP_0027525)	Pre-admitted

<b>PLAINTIFFS' TRIAL EX. #</b>	<b>DESCRIPTION</b>	<b>DATE ADMITTED</b>
232	BP America RAP Major Features dated Dec. 13, 1988  (Dep. Ex. 232; BP 0026780 - BP 0026787)	Pre-admitted
233	04.11.89 Memos from Liz Rossman to Various HR Reps re. Rollout Hearings  (Dep. Ex. 233; BP 0028023 – BP 0028027)	Pre-admitted
234	Strategies for Conducting Successful Meetings re. Acceptance of RAP  (Dep. Ex. 234; BP 0026706 -BP 0026718)	Pre-admitted
235	BP RAP Video Script Final 5.2.1989  (Dep. Ex. 235; BP 0028693 – BP 0028710)	6/22/23
236	Communications Objective  (Dep. Ex. 236; BP 0026926 – BP 0026995)	Pre-admitted
238	BP America RAP Highlights Slide Deck  (Dep. Ex. 238; BP 0027844 – BP 0027873)	Pre-admitted
239	BP America RAP Major Features effective 1/1/89  (Dep. Ex. 239; BP 0028252 – BP 0028288)	Pre-admitted
241	Train the Trainers Q&A  (Dep. Ex. 241; BP 0027874 – BP 0027886)	Pre-admitted
246	Decl of Ellen Collier in French v. BP Corp North America  (Dep. Ex. 246)	6/22/23
247	Pamphlet Introducing the RAP (Short Brochure)  (Dep. Ex. 247; BP 0027990 – BP 0027997)	Pre-admitted
248	Testimony of Ellen Collier dated June 7, 2005 to Senator Mikulski and Chairman DeWine  (Dep. Ex. 248)	6/22/23
249	03.06.20 Seyfarth Letter re Numerosity  (Dep. Ex. 249)	7/11/23

<b>PLAINTIFFS' TRIAL EX. #</b>	<b>DESCRIPTION</b>	<b>DATE ADMITTED</b>
250	03.26.20 Seyfarth Letter re. supplement to March 6 Letter  (Dep. Ex. 250)	7/11/23
251	06.20.20 Seyfarth Letter re. Amend DataPoint #2 in March 6, 2020 Letter re. numerosity  (Dep. Ex. 251)	7/11/23
275	Lawrence Deutsch Aff of Aug. 7, 2020  (Dep. Ex. 275)	7/11/23
276	Expert Report of Deutsch  (Dep. Ex. 276)	7/11/23 and 7/14/23
277	Second Declaration of Lawrence Deutsch  (Dep. Ex. 277)	7/17/23
294	RAP Plan dated Jan. 1989  (Dep. Ex. 294; BP 0000085 – BP 0000187)	Pre-admitted
296	10.15.20 Expert Report of Steve Grenadier  (Dep. Ex. 296)	7/11/23
297	ARP Plan Doc amended as of Jan. 1989  (Dep. Ex. 297; BP 0000001 – BP 0000084)	Pre-admitted
299	10.15.20 Expert Report of Thomas Terry  (Dep. Ex. 299)	7/11/23
300	11.11.20 Suppl Report of Thomas Terry  (Dep. Ex. 300)	7/11/23
301	09.18.20 Decl. of Thomas Terry  (Dep. Ex. 301)	7/18/23

<b>PLAINTIFFS' TRIAL EX. #</b>	<b>DESCRIPTION</b>	<b>DATE ADMITTED</b>
400	August 26, 1988 Letter from Karen S. Salinaro, Consulting Actuary of Kwasha Lipton to Elizabeth Rossman, Manager of Pension Plans for BP America, Inc. w/ "Details of Proposed Account Balance Plan Formula" prepared by Kwasha Lipton  (Dkt. 01-04 Exhibit D (to Complaint); Depo Exhibit 183 & 47; BP_0027633 - BP_0027648)	Pre-admitted
401	BP America Inc. Retirement Plan, Restated and Amended as of January 1, 1988  (BP_0000001 - BP_0000084; Dkt. 192, Ex. A)	Pre-admitted
403	March 7, 2014 Letter from Stanley Sporkin to John Minge w/ Attached Office of Ombudsman Confidential Investigation Final Report and Exhibits  (Dkt. 01-01 Exhibit A (to Complaint); BP_0024568 - BP_0024571 (letter))	7/18/23
405	June 3, 2015 Letter from BP Legal (Russell Shurtz) to Vicki Beckenbaugh, re. Guenther Pension Claim - Document Request  (Dkt. 01-03 Exhibit C (to Complaint); BP_0014825 - BP_0014831)	7/18/23
407	Undated ARP SPD relied upon by Larry D  (BP_0003568 - BP_0003599)	Pre-admitted
408	Larry Deutsch CV (Ex A to Second LD Declaration)  (Dkt. 223-01 Exhibit A)	Pre-admitted and Admitted 7/11/23
414	Activity high-level description PPT slide  (BP_0030220)	7/18/23
416	Conf. Draft Ombudsman Holding Statement  (BP_0030580)	7/18/23
418	6.18.2014 Ewing Email to Bradley re. Comms Plan  (BP_0030224 - BP_0030225)	7/18/23

<b>PLAINTIFFS' TRIAL EX. #</b>	<b>DESCRIPTION</b>	<b>DATE ADMITTED</b>
421	1990 Economic Report of the President	7/17/23
422	Rule 11 Letter Sent to Plaintiffs and Plaintiff's Counsel  (Dkt. 212, Ex. 4 (pp. 154 - 251) (includes Rule 11 Letter and Exhibits "A" - "Q"))	7/12/23
424	01.29.13 Email Minge to Guenther re. re. Heritage SOHIO  (GUE 013805)	Pre-admitted
425	05.02.22 Supplemental Expert Report of Lawrence Deutsch	7/11/23
426	Depo Ex. 227 with pg. 4  (BP_0027556 - BP_0027559)	Pre-admitted
427	York Declaration in Support of MSJ (with Exhibits)	Pre-admitted
428	08.19.2020 BP's Response to 5 <sup>th</sup> Requests for Production, 2nd Interrogatories	7/11/23
429	01.07.22 BP's Response to 1st Interrogatories	7/11/23
431	2000 RAP  (BP_0001045 - BP_0001251)	Pre-admitted
432	2009 RAP  (BP_0002388 - BP_0002770)	Pre-admitted
433	2015 RAP  (BP_0002848 - BP_0002951)	Pre-admitted
434	Determination of Guenther normal pay for vacation  (BP_0020573)	Pre-admitted
435	1989 Sch B, Retirement Assumptions  (BP_0024169 - BP_0024263)	Pre-admitted
436	Letter on cost  (BP_0027051 - BP_0027061)	Pre-admitted

<b>PLAINTIFFS' TRIAL EX. #</b>	<b>DESCRIPTION</b>	<b>DATE ADMITTED</b>
437	Guenther pre-2000 plan records (BP_0033107 - BP_0033155)	Pre-admitted
438	Black's calcs (BP_0056006)	7/12/23
439	Black's calcs (BP_0056011)	7/12/23
440	Glaser letter about ARP better than RAP in 1989 (BP_0056098)	7/12/23
441	Horn's calcs (BP_0059568)	7/12/23
442	Adams calcs (BP_0061956)	7/12/23
443	Horn's calcs (BP_0062414)	7/12/23
444	Guenther Pay Stubs (GUE_014642 - GUE_014668)	Pre-admitted and Admitted 7/14/23
445	Guenther Pay Stubs (GUE_014669 - GUE_014682)	Pre-admitted and Admitted 7/14/23
446	Guenther Pay Stubs (GUE_014683 - GUE_014697)	Pre-admitted and Admitted 7/14/23
447	Guenther Pay Stubs (GUE_014972 - GUE_014990)	Pre-admitted and Admitted 7/14/23
458	4.17.2014 York to Chang Email re. hypo. Calcs (BP_0030563)	7/18/23
459	6.22.2014 York to Dudley Email re. draft note to USBC updating on Sohio status (BP_0030572)	7/18/23



<b>PLAINTIFFS' TRIAL EX. #</b>	<b>DESCRIPTION</b>	<b>DATE ADMITTED</b>
460	Owen Opening Account Letter  (BP 0043043 - BP 0043044)	Pre-admitted
461	Owen 12/31/1988 accrual backup  (BP 0052539 - BP 0052540)	Pre-admitted
463	Mr. Terry's calculations re. Owen attached to his Declaration.  (BP 0033244 (in native format))	Pre-admitted
464	Guenther Pay Stubs  (GUE 014810 - GUE 014834)	Pre-admitted
465	9.16.2014 Email from Heller to Keller  (BP 0031100 – BP 0031103)	7/18/23
466	8.2.2014 Email from Segura to Pillai  (BP 0031152 – BP 0031154)	7/18/23
471	Email correspondence between Jeff Heller and Billie Garde re. suggestions for changes to stmt  (BP 0026265 - BP 0026266)	7/18/23
571	T L Coakley Benefit Form Summary	7/12/23
572	T L Coakley Check	7/12/23
573	T L Coakley Lump Sum	7/12/23
574	J G Reitz FAE Annuity Calcs	7/12/23
576	F Guenther "Defined Benefit Calculation Detail Worksheet"	7/12/23
587	Defendant's Initial Disclosures	7/18/23

Dated: August 31, 2023

Respectfully submitted,

By /s/ Peter Steilberg, III

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## **CERTIFICATE OF SERVICE**

I do hereby certify that on August 31, 2023, I electronically filed the foregoing **PLAINTIFFS' SECOND AMENDED EXHIBIT LIST** using the Court's CM/EFC method, and that a copy of the foregoing was served on all counsel of record, as listed below, via the Court's CM/EFC method. This document was filed with the permission of the attorney in charge for Plaintiffs.

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